

FILED MAY 23 '23 AM 8:56 USDCAL

**UNITED STATE DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF ALABAMA  
MOBILE DIVISION**

ESSENCE JACKSON	*	CIVIL ACTION #:22-cv-00478
Plaintiff		
VERSUS	*	JUDGE: CALLIE V.S. GRANADE
SHELL CHEMICAL LP	*	MAG: KATHERINE P. NELSON
Defendant		
*   *   *	*   *   *	*   *   *

**MOTION FOR EXTENSION OF TIME TO RESPOND TO  
DEFENDANT'S 12(b)(6) MOTION**

NOW INTO COURT comes plaintiff, pro se, who respectfully moves this Honorable Court for an extension of time within which to respond to defendant's 12(b)(6) motion to dismiss or alternatively for a more definite statement for the following reasons to-wit:

Plaintiff shows that she has been diligently seek representation in this matter to no avail. However, she has a meeting with another attorney tis week and expect to retain counsel within the next seven (7) days.

As such, to allow additional time within which to retain adequate representation in this matter to prosecute her cause of action will better serve the interest of injustice.

WHEREFORE, the plaintiff moves this Honorable to allow the plaintiff an additional seven (7) days within which to respond to the defendant's

Motion to Dismiss, alternatively, for a more definite Statement.

Respectfully submitted,

  
ESSENCE JACKSON

CERTIFICATE OF SERVICE

This is to certify that a copy of the foregoing Motion for Extension was served May 23, 2023 by Electronic filing through the attached Notice of Electronic filing by the court's electronic filing system, and by First Class Mail,

Postage Prepaid upon:

Pablo Orozco (pro hac vice forthcoming) MN Reg. No. 0396811,  
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